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March 24, 2017

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*Filed electronically through ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Ex Parte Communication  
*In the Matter of Revitalization of the AM Service* (MB Docket No. 13-249)**

Dear Ms. Dortch:

Today, Media One Communications, Inc. ("Media One") filed the attached comments in response to the *Notice of Proposed Rulemaking* concerning the proposed allotment of Channel 295A at Fort Walton Beach, Florida by Northwest Florida Media, LLC (MB Docket No. 16-442; RM-11783) ("*Channel 295A Allotment NPRM*"). Media One is the licensee of WRNE(AM), Gulf Breeze, Florida (Facility ID No. 41010), and FM translator W295AP, Pensacola, Florida (Facility ID No. 150909).

Media One's comments detail the financial hardships that Media One would face if WRNE lost its ability to rebroadcast in the FM band through W295AP should the FCC adopt the proposed amendment to the FM Table of Allotments provided in the *Channel 295A Allotment NPRM*. Media One believes that it is important for the Commission to recognize that the value of AM broadcasters' ability to rebroadcast in the FM band using FM translators is seriously diminished by permitting amendments to the FM Table of Allotments – such as the one proposed in the *Channel 295A Allotment NPRM* – without consideration of the fact that AM broadcasters use FM translators to rebroadcast in the FM band. This clearly conflicts with the ultimate goal of the AM Revitalization Program – which is to ensure the viability of the AM service in the face of newer technologies in order to guarantee that AM broadcasters continue to serve the public interest.

March 24, 2017

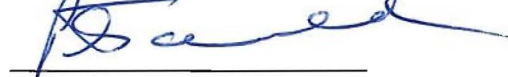
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Accordingly, Media One's comments are provided for consideration in the above-referenced proceeding.

Any questions regarding this matter should be directed to the undersigned.

Respectfully submitted,



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Peter Tannenwald  
Keenan Adamchak

*Counsel for Media One Communications, Inc.*

Attachment

cc: (w/att) David D. Burns, Esq.  
Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, N.W.  
Washington, D.C. 20036

Counsel for Northwest Florida Media, LLC



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Evelyn M. Ojea

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	<b>MB Docket No. 16-422</b>
FM Table of Allotments,	)	RM-11783
FM Broadcast Stations.	)	
(Fort Walton Beach, Florida)	)	

To: Assistant Chief, Audio Division, Media Bureau  
*Filed Electronically via ECFS*

**COMMENTS OF MEDIA ONE COMMUNICATIONS, INC.**

1. Media One Communications, Inc. ("Media One"), provides this response to the *Notice of Proposed Rulemaking* ("NPRM") in the above-captioned proceeding, FCC 17-125, released February 3, 2017. The NPRM proposes the allotment of Channel 295A at Fort Walton Beach, Florida, as proposed by Northwest Florida Media, LLC's ("Northwest Florida Media"). Media One is the licensee of WRNE(AM), Gulf Breeze, Florida (Facility ID No. 41010), and FM translator W295AP (Facility ID No. 150909). The translator will be displaced if the proposed allotment is made and a new FM station is constructed on Channel 295.

2. Media One honors and respects the FCC rules and regulations, and it recognizes the Commission's channel priority and allocation procedures. Media One files this response to inform the FCC that Northwest Florida Media's proposed allotment of Channel 295A at Fort Walton Beach, Florida will cause great financial hardship to Media One, which has operated WRNE on the Gulf Coast for over twenty-five years as a standalone AM station. At times, the operation of WRNE has been difficult for Media One due to increasing competition in the local marketplace. With hard work, however, Media One has managed to stay in business. Several years ago, Media One purchased and relocated W295AP to its current community of license,

Pensacola, Florida. Media One has invested some \$70,000 to acquire the translator and get it operating where it is today, but the availability of the FM translator to rebroadcast WRNE in the FM band has allowed Media One to make some important and needed financial gains.

3. FM translators are key to the survival of standalone AM stations. Media One understands that there is very little that can be done if someone ever wants to take away Media One's FM translator by petitioning to amend the FM Table of Allotments. Media One is unsure how long this rule has been in place, but wishes that the AM stations were exempt from this rule – especially if an AM station has been using the frequency for a certain amount of time, or if they are a standalone AM station. While Media One cannot itself change or waive the displacement rule, a waiver of this costly engineering requirement would greatly benefit struggling AM station licensees such as Media One. Similarly, allowing AM stations to keep their assigned frequencies would greatly benefit AM broadcasters. Media One realizes that if the proposed amendment to the FM Table of Allotments is adopted, Media One will have an opportunity to bid to acquire this frequency as a full power FM station. Media One does not believe, however, that many small AM broadcasters, such as Media One, would be able to outbid the competing major broadcasters. As such, Media One stands to lose its ability to rebroadcast WRNE in the FM band should the FCC choose to adopt Northwest Florida Media's petition.

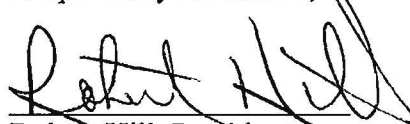
4. Media One is a small minority broadcaster serving the Gulf Coast area for over twenty-five years. Most of that time WRNE has been the *only* station serving the African American and Hispanic communities in the Gulf Coast area. As such, Media One is more than a broadcaster, but is also a public servant to these underrepresented communities. Through WRNE, Media One has provided fundraisers for funerals, surgeries, education, home building, and much more. WRNE has also sponsored many health fairs dealing with an array of viruses and illnesses

plaguing its listener community. Further, WRNE was probably the first broadcast station to do live hurricane coverage in Northwest Florida. These are just some of the many community services that Media One – through WRNE – offers to its listeners.

5. Media One requests the FCC's consideration in this rulemaking proceeding to allow W295AP to keep its frequency, or to obtain another frequency to rebroadcast WRNE (AM) on the FM band should the FM translator be forced to surrender its 106.9 FM frequency. Media One also requests that the Commission consider other options for AM stations to hold onto their FM frequencies, especially where, as here, a community already has five locally licensed aural services and receives additional signals from stations licensed to nearby communities, so Ft. Walton Beach is considered well-served under cases involving fair and equitable distribution of frequencies. Relocation to another frequency would be costly – probably another \$20,000-\$25,000 -- and is financially damaging to AM stations as well as their listeners every time these stations are forced to relocate.

6. Media One thanks the Commission in advance for its consideration.

Respectfully submitted,



Robert Hill, President  
Media One Communications, Inc.

*Of Counsel:*

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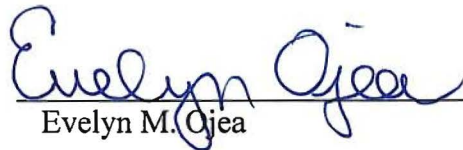
Date: March 24, 2017

**CERTIFICATE OF SERVICE**

I, Evelyn M. Ojea, do hereby certify that I have, this 24<sup>th</sup> day of March 2017, caused a copy of the foregoing "Comments of Media One Communications, Inc. to be sent by first class United States mail, postage prepaid, to the following:

David D. Burns, Esq.  
Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, N.W.  
Washington, D.C. 20036

Counsel for Northwest Florida Media, LLC

  
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Evelyn M. Ojea